



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

TBM/SMF
F. #2021R00164

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 20, 2025

By ECF

The Honorable Joseph A. Marutollo
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Shares of 21 East 61st Street Apartment Corp., et al.
Civil Docket No. 24-2147 (RPK) (JAM)

Dear Judge Marutollo:

The government writes pursuant to the Court's May 31, 2025 order directing the parties to submit by June 20, 2025 a status update regarding ongoing discovery disputes in the above-captioned matter. Specifically, the parties disagree about the breadth of the confidentiality designations applied by claimants' counsel to claimants' various responses to special interrogatories the government served on them.

In the late afternoon of Wednesday, June 18, 2025, counsel for the claimants provided the government with proposed confidentiality designations. The government briefly reviewed those designations and believes that many are inappropriate and overbroad. However, in order to appropriately assess the bases for these designations and prepare a potential challenge, the government intends to request further clarification from claimants' counsel. That process is ongoing.

Given the nature and volume of the material at issue, and to allow for a complete evaluation of the claimants' proposed designations, the government respectfully requests that the Court adjourn by at least 21 days the status conference currently scheduled for June 26, 2025. This adjournment will allow the parties to more meaningfully meet and confer, and potentially to narrow the scope of any dispute.

Counsel for the claimants has indicated they consent to this request.

Respectfully submitted,

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By: /s/
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by 

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